## IN THE UNITEDE STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

MARY MANLEY,	§			
PLAINTIFF,	§ §			
v.	8 § §			
STOVIAW CDOUD DLLC a Tayor	§ §	Case	No:	4:23-cv:01122
STOY LAW GROUP PLLC, a Texas Domestic Limited Liability Company	8 8 8			
And	\$ §			
CHRISTOPHER E. STOY, an individual	§ §			
DEFENDANTS	§			

## MOTION FOR SUBSTITUTE SERVICE OF PROCESS

COMES NOW MARY MANLEY ("Plaintiff") and files this, her Motion seeking the Court's authorization of substitute service of process on Defendants, Stoy Law Group, PLLC, a Texas Domestic Limited Liability Company AND Christopher E. Stoy, an individual and each of them.

In support of her Motion, Plaintiff shows the Court:

- 1. Attached to this Motion, marked "Exhibit A" and by this reference is fully incorporated herein, is a true and correct copy of a report by Lindsay T. Nance, a duly licensed Texas process server employed by *ABC Process Service* and engaged by Plaintiff for the purpose of service of process on Defendants.
  - 2. In summary Exhibit A informs that the correct business location/address for Defendants

Case 4:23-cv-01122-O Document 9 Filed 02/13/24 Page 2 of 2 PageID 33

was determined to be 4055 International Plaza Suite 550, Fort Worth, TX 76109 "Defendants'

Business Address" and an unsuccessful attempt of service of process was made there on January 4,

2024.

3. The process server was advised by the receptionist that Defendant Stoy would be out of

the office "for a week or two." A second unsuccessful attempt of service of process was made there on

February 6. 2024. The receptionist advises again that Mr. Stoy will be gone for another week. A third

unsuccessful attempt of service of process was made at Defendants' Business Address on February 8,

2024. The receptionist advises that Mr. Stoy is out and provides no information of an expected return

date.

4. After the correct business location was determined and Mr. Stoy's presence was

confirmed, three unsuccessful attempts of service of process were made. Defendants seem to be

effectively evading service of process at this point.

5. Accordingly, Plaintiff requests the Court to authorize Plaintiff or Plaintiff's agents, to

serve process on Defendants and each of them by leaving each all documents required by law, to wit: a

true copy of the summons with attached Complaint with any person more than eighteen years of age at

Defendants' Business Address which is 4055 International Plaza, Suite 550, Fort Worth, Texas. 76109

all of which is reasonably effective to give each Defendant notice of the suit.

**6.** A proposed Order is attached.

Dated February 12, 2024.

Respectfully submitted,

DAVID M. CURTIS

Texas State Bar 05270930

DAVID M. CURTIS & ASSOCIATES. PC

7750 N. MacArthur Blvd, Ste. 121-373

Los Colinas, TX. 75063

david@laborassociates.com

833.444.4714

ATTORNEYS FOR PLAINTIFF